celebrated, has ever before been denied recognition, and this is conceded in the principal case. The decision seems to proceed in part on the theory originally followed by the civil law, which finds some support in the English cases, that capacity to marry is a matter of personal status, to be determined by the law of the domicile. *Cf. Sottomayor v. De Barros* (1877) 3 P. D. 1; *Brook v. Brook* (1861) 9 H. L. Cas. 192. But the question is confused by the emphasis placed on the public policy of the forum, as evidenced by the Wisconsin statutes, and its similarity to the policy of Illinois. If the law of the domicile is the proper criterion, its application can hardly be conditioned on such similarity. And since it was not the public policy of Wisconsin, but the similar policy of Illinois, which the court professedly enforced, the decision cannot be explained on the analogy, which would be strained at best, of cases holding that the distinctive public policy of the forum may deny recognition to certain classes of foreign marriages. *State v. Bell* (1872, Tenn.) 7 Baxt. 9 (miscegenation); *United States v. Rodgers* (1901, D. C. E. D. Pa.) 109 Fed. 886 (consanguinity). The decision might possibly be supported by regarding the situation as similar to that existing before a decree *nisi* has become absolute, and considering the divorce incomplete until the year has expired. This ground also is suggested in the opinion, but no other decided case has been found to support it. See, however, dissenting opinion in *Estate of Wood, supra;* and *cf. McLennan v. McLennan* (1897) 31 Oreg. 480, 50 Pac. 802.

L. F.

CONFLICT OF LAWS—WORKMEN'S COMPENSATION ACT—FOREIGN CONTRACT OF EMPLOYMENT.—The plaintiff, employed under a contract made in Massachusetts, was injured in Connecticut while working within the scope of his employment. Suit was brought in Connecticut under the Connecticut Workmen's Compensation Act. *Held,* that the plaintiff might recover. *Donthwright v. Champlin* (1917) 91 Conn. 524, 100 Atl. 97. See COMMENTS, p. 113.

CONSTITUTIONAL LAW—ADMIRALTY—STATE WORKMEN'S COMPENSATION ACT NOT APPLICABLE TO INJURIES WITHIN ADMIRALTY JURISDICTION.—An employee of a company operating a coastwise steamship line was accidentally killed while engaged in the work of unloading a cargo at a pier in New York. In proceedings under the New York Workmen's Compensation Act, his widow and children received an award which was approved by the New York Court of Appeals. The case was taken by writ of error to the United State Supreme Court. *Held,* that the state compensation act, as applied to matters within admiralty jurisdiction, was in conflict with the grant of exclusive admiralty jurisdiction to the federal courts by the Constitution, and was to that extent invalid, and the award must be set aside. *Southern Pacific Co. v. Jensen* (1917) 37 Sup. Ct. 524. See COMMENTS, next month.

CONSTITUTIONAL LAW—CONSTITUTIONAL CONVENTIONS—LEGISLATURE'S POWER TO CALL.—The plaintiff brought suit for himself and all other